

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	No. 25-cr-10272-LTS-JGD
)	
KSENIIA PETROVA,)	
)	
Defendant)	

JOINT FINAL STATUS REPORT

Pursuant to Local Rule 116.5(c), the parties hereby file this status report in connection with the final status conference that is scheduled for October 14, 2025. The parties jointly and respectfully request that this status report be considered in lieu of the scheduled status conference.¹ The parties further request that the Court set a briefing schedule for Defendant's anticipated discovery motion and a hearing on that motion to coincide with a final status conference.

(1) Discovery (L.R. 116.5(c)(2)(A))

At this time, the government has produced all discovery it intends to produce. Any additional discovery from the government may follow in the course of preparing for trial. The government renews its request for reciprocal discovery from the Defendant pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure and Local Rule 116.1(d).

The government is aware of its obligations to produce materials under Fed. R. Crim. P. 16, Local Rule 116.2(b)(1), and *Brady vs. Maryland*. To the extent any additional discovery—including *Brady* material—becomes available, the Government will promptly produce it.

¹ Defense counsel are scheduled to begin a trial in the Southern District of New York on October 14, 2025, which is expected to last three weeks.

(2) Discovery Requests and Motions (L.R. 116.5(c)(2)(B))

The government has responded to a discovery request from the Defendant. Counsel for the Defendant has indicated that the Defendant intends to file a discovery motion but that counsel will not be able to file this motion before mid-November based on counsel's trial schedule. The parties respectfully request that the Court set a briefing schedule and hearing on the Defendant's anticipated motion.

(3) Motions under Fed. R. Crim. P. 12(b) (L.R. 116.5(c)(2)(C))

No motions under Fed. R. Crim. P. 12(b) are pending. Defendant anticipates filing dispositive motions after the resolution of the planned discovery motion.

(4) Excludable Delay (L.R. 116.5(c)(2)(D))

Zero days of non-excludable time have accrued. The parties request that the Court exclude the period of time from the date of this status report until the final status conference under 18 U.S.C. § 3161(h)(7)(A) because the ends of justice served by this exclusion—namely, time to prepare for trial—outweigh the interests of the public and the Defendant in a speedy trial.

(5) Estimated Number of Trial Days (L.R. 116.5(c)(2)(E))

The parties presently anticipate that a trial would require approximately one week.

Respectfully submitted,

KSENIIA PETROVA

By her attorneys,

/s/ William W. Fick

William W. Fick, Esq.

Daniel N. Marx, Esq.

Fick & Marx LLP

24 Federal Street, 4th Floor

Boston, MA 02110

LEAH B. FOLEY

UNITED STATES ATTORNEY

/s/ David M. Holcomb

David M. Holcomb

Assistant United States Attorney

One Courthouse Way, Suite 9200

Boston, Massachusetts 02210

Certificate of Service

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Dated: October 8, 2025

/s/ David M. Holcomb
Assistant United States Attorney